

## BRACEWELL

August 27, 2020

VIA ECF

Honorable Lewis A. Kaplan  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

MEMO ENDORSED

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write, with the consent of the government and Pretrial Services, to seek a modification of Mustafa Abdel-Wadood's bail conditions. Mr. Abdel-Wadood's travel presently is limited to the Southern and Eastern Districts of New York. In approximately one week, however, Mr. Abdel-Wadood's son will be moving from Dubai to the United States to begin college in Washington, D.C. Mr. Abdel-Wadood would greatly appreciate having the freedom to travel to Washington, D.C. to help his son move into his living quarters and then to visit him on occasion (Mr. Abdel-Wadood has been separated from his family for much of the past year). Mr. Abdel-Wadood would provide Pretrial Services with his itinerary for travel to Washington to see his son in advance of any trips and would remain in full compliance with any applicable COVID-19 regulations. All other bail conditions, including the surrender of Mr. Abdel-Wadood's passport and the \$10 million bond secured by two properties, would remain in place.

As noted, the government (AUSA Andrew Thomas) consents to this proposed modification; Pretrial Services has no objection. Pretrial Services reports that Mr. Abdel-Wadood has been fully compliant with his bail conditions.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

cc: AUSA Andrew Thomas  
Pretrial Services Officer Dayshawn Bostic

Paul Shechtman  
Partner

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Gratified  
Andrew Thomas

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